



# REPORT TO PLANNING COMMISSION City of Sacramento

# 4

915 I Street, Sacramento, CA 95814-2671

PUBLIC HEARING  
May 10, 2012

To: Members of the Planning Commission

**Subject: Circle K Convenience Market Alcohol Sales (P12-003)**

A request to allow an existing 2,700 square-foot convenience market at a service station to sell alcohol for off-premises consumption on a 0.8-acre parcel in the General Commercial (C-2) zone.

**A. Environmental Determination: Exempt** per CEQA Guidelines Section 15061 (b)(3) – No Significant Effect;

**B. Special Permit** to allow alcohol sales for off-premises consumption in the General Commercial (C-2) zone.

**Location/Council District:**

6500 Mack Road, Sacramento, CA 95823

Assessor's Parcel Number 117-0330-002-0000

Council District 8

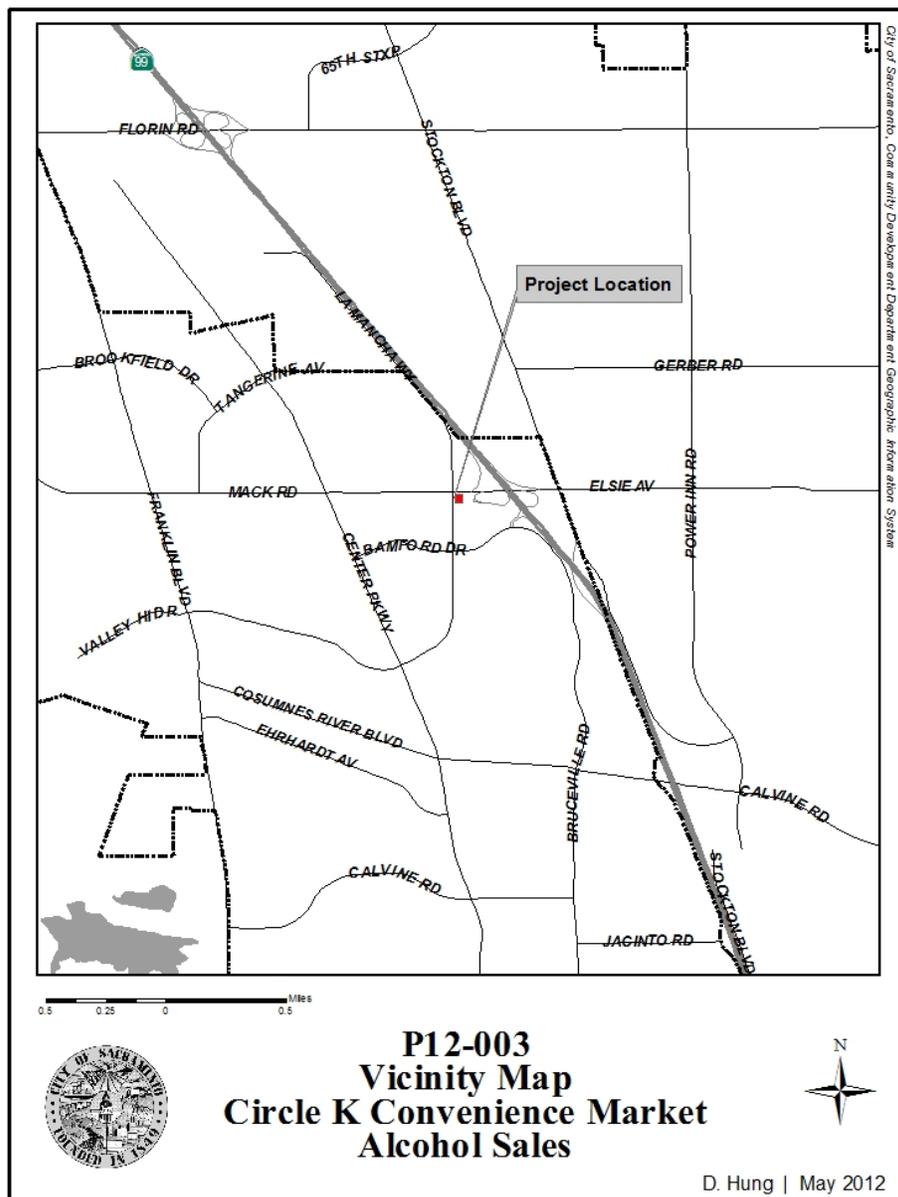
**Recommendation:** Staff recommends the Commission approve the request based on the findings and subject to the conditions listed in Attachment 1. The Commission has final approval authority over items A and B above, and its decision is appealable to City Council. **The project is non-controversial at the writing of this report.**

**Contact:** David Hung, Associate Planner, (916) 808-5530;  
Lindsey Alagozian, Senior Planner, (916) 808-2659

**Applicant:** Brian Holloway, Holloway Land Company, (916) 996-2019, 2100 21<sup>st</sup> Street, Sacramento, CA 95818

**Owner:** Convenience Retailers, LLC c/o Sam Hirbod, President and Treasurer, shirbod@pcandf.com, (925) 931-5706, and Hamilton Tran, Secretary, htran@pcandf.com, (925) 931-5719, 7180 Koll Center Parkway, Suite 100, Pleasanton, CA 94566

### Vicinity Map



**Summary:** The applicant is requesting permission to sell beer and wine at an existing service station with a 2,700 square-foot convenience market located in the General Commercial (C-2) zone. The project requires a Special Permit to allow the sale of beer and wine at the convenience market. Staff has sent early notification to community groups and property owners and businesses within 500 feet of the site. At the time of the writing of this report, staff is not aware of any outstanding issues.

<b>Table 1: Project Information</b>
<b>General Plan designation:</b> Suburban Corridors (F.A.R. 025 – 2.00)
<b>Existing zoning of site:</b> C-2 (General Commercial)
<b>Existing use of site:</b> Service Station and Convenience Market
<b>Property area:</b> 0.8 acres

**Background Information:** In 2003, the Zoning Code was amended to require the approval of a Special Permit for a service station in the C-2 zone. The subject service station was established prior to the Special Permit requirement; therefore, the service station has a “deemed” special permit. On October 26, 2004, the Zoning Administrator approved a Minor Modification to the deemed Special Permit to modify the subject service station which involved remodeling the existing canopies, painting the building and replacing the signage (Z04-224). On May 12, 2008, the Zoning Administrator approved a Minor Modification to the deemed Special Permit to install a Phase II Enhanced Vapor Recovery (EVR) System at the service station, including a clean air separator tank (Z08-078). On September 3, 2009, the Zoning Administrator approved a Minor Modification to the deemed Special Permit to remodel the subject service station which involved the removal of existing roll up doors, façade enhancement and addition of 5 parking spaces to the site (Z09-146). Currently the service station and convenience market operates 24 hours a day. The 24-hour convenience market exists by right since no residentially zoned parcel nor dwelling is within 500 feet of it.

**Public/Neighborhood Outreach and Comments:** Early notification was sent to various neighborhood advisory groups including Center Crossroads Neighborhood Association, North Laguna Creek Neighborhood Association, Regency Place Homeowners Association, Wood Park Area, and WalkSacramento. An early notice was also sent to property owners and businesses within 500 feet radius of the project site. The hearing was notified to property owners and businesses within 500 feet radius of the site and the property has been posted. Staff has not received any comments from the public at the time of the writing of this report.

**Environmental Considerations:** The Community Development Department, Environmental Planning Services Division has reviewed this project and determined that it is exempt from the provisions of the California Environmental Quality Act (CEQA) Section 15061(b)(3). The activity is covered by the general rule that CEQA applies only to projects, which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

### **Policy Considerations:**

General Plan. The 2030 General Plan Update was adopted by City Council on March 3, 2009. The 2030 General Plan’s goals, policies, and implementation programs define a

roadmap to achieving Sacramento's vision to be the most livable city in America. The 2030 General Plan designation of the subject site is Suburban Corridors which provides for a mix of single-use commercial and residential development and horizontal and vertical mixed-use development including retail and service oriented uses. The 2030 General Plan has identified goals and policies under the Land Use and Urban Design Element. Some of the goals and policies supported by this project are:

- *Land Use and Urban Design Element (Policy LU 2.1.3) Complete and Well-Structured Neighborhoods.* The City shall promote the design of complete and well-structured neighborhoods whose physical layout and land use mix promote walking to services, biking, and transit use; foster community pride; enhance neighborhood identity; ensure public safety; are family-friendly and address the needs of all ages and abilities.
- *Land Use and Urban Design Element (Policy LU 6.1.1) Mixed-Use Corridors.* The City shall create or improve mixed-use corridors by requiring compact development patterns that are oriented to and frame the street, establish a safe and comfortable environment for walking, and avoid encroachment upon adjacent residential areas.
- *Public Health and Safety (Policy 1.1.7) Development Review.* The City shall continue to include the Police Department in the review of development projects to adequately address crime and safety, and promote the implementation of Crime Prevention through Environmental Design principles.

The proposed project meets the 2030 General Plan goals and policies related to Citywide Land Use and Urban Design Element. The project was reviewed by the Police Department and conditions and restrictions are provided for the proposed alcohol sales. The project also meets the minimum floor area ratio for the Suburban Corridors designation of the General Plan.

### **Project Design:**

#### **Land Use**

The applicant is requesting permission to sell beer and wine at an existing gas station and convenience market in order to allow the business to remain economically viable and to enhance the merchandise selections. Section 17.24.050(40) of the zoning code requires the issuance of a special permit for the sale of alcoholic beverages in a store less than 15,000 square-foot in size. The Planning Commission shall consider whether the proposed use will negatively impact nearby residentially zoned areas, and shall give consideration to the distance of the proposed use from residential buildings and from churches, schools, hospitals, public parks and playgrounds, child care centers, social services, and other similar uses. In addition to the considerations applicable to all special permit applications, the Planning Commission may consider the following regulations: hours of operation; quantity and size of containers sold; alcoholic content of wines sold for off-premises consumption; percentage of shelf space devoted to alcoholic beverages; a requirement that the establishment post, in compliance with the city code, signs prohibiting the possession of open alcoholic beverage containers or the consumption of alcoholic beverages on any property adjacent to the establishment

under the control of the establishment's operator; any other activities proposed for the premises.

The subject site abuts an existing service station to the east, zoned C-2, and another existing service station is located across Valley Hi Drive to the west, also zoned C-2. The convenience store at the service station to the east currently sells alcohol. To the north of the site is Mack Road and a vacant property exists on the other side of Mack Road, zoned C-2. A commercial building exists to the south of the site, on a property zoned C-2. There are no known sensitive uses such as churches, schools and public parks within 500 feet radius of the subject site. There is an existing hospital campus (Kaiser Permanente) about a quarter mile from the site.

The applicant is applying for Type 20 (Off-Sale Beer and Wine) license from the Department of Alcoholic Beverage Control. Type 20 license authorizes the sale of beer and wine for consumption off the premises where sold. Currently, there are several retail businesses within the same census tract which have an active Type 20 license:

<b>Name</b>	<b>Address</b>	<b>Approximate Walking Distance from Project Site</b>
Mack Road AM/PM	6698 Mack Road	150 feet (0.03 mile)
Dollar Tree	6650 Valley Hi Drive	550 feet (0.10 mile)
Big Lots	6630 Valley Hi Drive	890 feet (0.17 mile)
Presto Food & Deli	6625 Valley Hi Drive	1,000 feet (0.19 mile)
7-Eleven Store	6591 Wyndham Drive	2,065 feet (0.39 mile)

The City's Police Department has issued a letter to Alcoholic Beverage Control stating that the Public Convenience or Necessity will be served with this proposed beer and wine sales (see Attachment 2). The Police Department has also placed conditions of approval on the alcohol sales for this special permit.

In evaluating the special permit proposal, the Planning Commission is required to make the following findings:

- A. The proposed use will not adversely affect the peace or general welfare of the surrounding neighborhood.

The proposed use will not adversely affect the peace or general welfare of the surrounding neighborhood in that: 1) alcohol sales are limited to the hours between 6:00 a.m. and 11:00 p.m., 2) the sale of fortified wines and distilled spirits is prohibited and alcoholic container sizes are regulated, 3) security system and site monitoring are mandated for the business; and 4) there are currently no sensitive uses within 500-foot radius of the site.

- B. The proposed use will not result in undue concentration of establishments dispensing alcoholic beverages.

The proposed use will not result in undue concentration of establishments dispensing alcoholic beverages in that the Police Department has reviewed the project and issued a letter stating that Public Convenience or Necessity is served.

C. The proposed use will not enlarge or encourage the development of a skid row or blighted area.

The proposed use will not enlarge or encourage the development of a skid row or blighted area since the sale of alcohol will be limited to the hours between 6:00 a.m. and 11:00 p.m. and the site is conditioned to be maintained and kept clear of litter.

D. The proposed use will not be contrary to or adversely affect any program of redevelopment or neighborhood conservation.

The proposed use is not contrary to policies in the 2030 General Plan and does not impact redevelopment or neighborhood conservation.

Staff supports the request to sell beer and wine at the subject site since Public Convenience or Necessity is served and the project is conditioned to restrict hours of alcohol sales, limit the sizes of alcoholic containers, and provide security monitoring.

### **Access, Circulation and Parking**

The site is located at the southeast corner of Mack Road and Valley Hi Drive with separate ingress/egress driveways serving both streets. There is no reciprocal access with the adjacent properties to the west and south. A total of 18 parking spaces are shown on the site plan. The proposal does not expand the envelope of the existing convenience market and therefore does not require parking in addition to what is currently provided on the site.

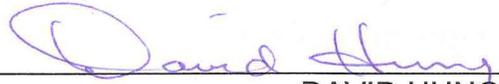
### **Height, Bulk and Setbacks**

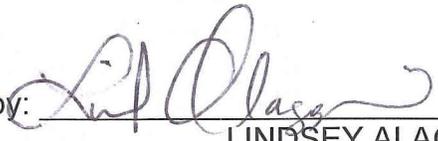
There are no changes to the height, bulk or setback of any structures on the site.

### **Building design, signage and landscaping**

There is no proposed expansion to the existing 2,700 square foot convenience market building and no revision to the site layout including landscaping. No new signage is proposed under this application. The proposed addition of beer and wine products will be located within some of the existing coolers within the sales area. The hours of operation of the convenience market is 24 hours a day but the sale of alcoholic beverages is limited to the hours between 6:00 a.m. and 11:00 p.m. as a condition of approval.

**Conclusion:** Staff recommends the Commission approve the request based on the findings and subject to the conditions listed in Attachment 1. Staff's recommendation is based on Public Convenience or Necessity being served and that the project is conditioned to restrict hours of alcohol sales, limit the sizes of alcoholic containers, and provide security monitoring.

Respectfully submitted by:   
DAVID HUNG  
Associate Planner

Approved by:   
LINDSEY ALAGOZIAN  
Senior Planner

Recommendation Approved:

  
GREGORY BITTER, AICP  
Principal Planner

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**Attachment 1**  
**Proposed Findings of Fact and Conditions of Approval**  
**Circle K Convenience Market Alcohol Sales (P12-003)**  
**6500 Mack Road, Sacramento, CA 95823**

**Findings of Fact**

**A. Environmental Determination: Exempt**

1. Based on the determination and recommendation of the City's Environmental Planning Services Manager and the oral and documentary evidence received at the hearing on the Project, the Planning Commission finds that the Project is exempt from review under Section 15061(b)(3) of the California Environmental Quality Act Guidelines as follows:
  - a. The activity is covered by the general rule that CEQA applies only to projects, which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

**B. The **Special Permit** to allow alcohol sales for off-premises consumption in the General Commercial (C-2) zone is approved subject to the following Findings of Fact and Conditions of Approval:**

1. The proposed use will not adversely affect the peace or general welfare of the surrounding neighborhood in that: 1) alcohol sales are limited to the hours between 6:00 a.m. and 11:00 p.m., 2) the sale of fortified wines and distilled spirits is prohibited and alcoholic container sizes are regulated, 3) security system and site monitoring are mandated for the business; and 4) there are currently no sensitive uses within 500-foot radius of the site.
2. The proposed use will not result in undue concentration of establishments dispensing alcoholic beverages in that the Police Department has reviewed the project and issued a letter stating that Public Convenience or Necessity is served.
3. The proposed use will not enlarge or encourage the development of a skid row or blighted area since the sale of alcohol will be limited to the hours between 6:00 a.m. and 11:00 p.m. and the site is conditioned to be maintained and kept clear of litter.
4. The proposed use is not contrary to policies in the 2030 General Plan and does not impact redevelopment or neighborhood conservation.

**Conditions of Approval**

- B.** The **Special Permit** to allow alcohol sales for off-premises consumption in the General Commercial (C-2) zone is hereby approved subject to the following conditions:

Planning Division

- B1. The applicant shall obtain all necessary licenses from the Department of Alcoholic Beverage Control prior to the sale of alcoholic beverages.
- B2. The business shall establish a “Good Neighbor” policy that includes but not limited to the following:
  - a. Provide an emergency contact person and phone number on-site, in a clearly identified place readily accessible to residents of the neighborhood; and
  - b. Establish a process for neighbors to communicate directly with the management staff should there be any problems or issues.
- B3. The site shall be maintained and kept clear of any litter.
- B4. Any modifications to the project shall be subject to review and approval by the Planning Division.

Police Department

- B5. Alcohol sales are limited to the hours between 6:00 AM and 11:00 PM.
- B6. Beer, ale, and/or malt beverages shall be sold in the original factory packages of a six pack or greater, except malt based coolers.
- B7. Wine and/or wine coolers must be sold in no less than 750 ml containers or 4 pack containers.
- B8. No fortified wines shall be sold.
- B9. No distilled spirits shall be sold.
- B10. No advertising of beer or wine sales shall be allowed on exterior signs or window signs.
- B11. All alcohol shall be secured during the hours of 11:00 PM and 6:00 AM.
- B12. The main cashier shall be equipped with a central station silent robbery alarm system and telephone.

- B13. Any rear door used to admit employees or deliveries shall be equipped with a 180 degree viewing device to screen persons before allowing entry.
- B14. Height markers which display height measurements are required on the interior doorway of the business.
- B15. All exterior lighting fixtures shall be maintained and operational.
- B16. No public telephone/pay phone shall be allowed on the premises.
- B17. The applicant shall post the property No Trespassing / No Loitering in accordance with section 602(k) of the California Penal Code, and sign an enforcement agreement with the Sacramento Police Department to prosecute all violators.
- B18. Signs shall be posted prohibiting consumption of alcoholic beverages in the business and in the parking lot areas. The proprietor, or their agent, shall immediately disperse loiterers in order to prevent nuisance or unreasonable interference with adjacent properties.
- B19. There shall be no video/arcade machines maintained upon the premises at any time.
- B20. All dumpsters must be kept locked.
- B21. The applicant shall be responsible for the daily removal of all litter generated by the business, from the subject site, adjacent properties and streets.
- B22. Closed-circuit color video cameras shall be employed to monitor the cash registers and the entrances.
- B23. The recording device shall be a digital video recorder (DVR) capable of storing a minimum of 7 days worth of activity. Recordings shall be kept for a minimum of 7 days. (A DVR capable of storing 30 days worth the activity is preferable).
- B24. The DVR must be kept in a secured area that is accessible to only the management.
- B25. Television style monitors should be mounted in a visible location near the entrance so that patrons can clearly see their activities are being monitored when they enter through the front door.
- B26. Closed-circuit color video cameras shall also be used in the parking lot area to create comprehensive coverage. Parking lot cameras often make an immense impact during the investigation of a crime.

B27. Classical Music shall be played in the parking lot area, between the hours of 6:00 p.m. to 3:00 a.m., as a means of deterring crime and loitering.

#### Advisory Notes

##### Planning

1. The first full-sized sheet of the project's Building Permit plans set shall include: 1) A Zoning Affidavit signed by the applicant that affirms the plans submitted for building permit comply with all conditions of approval and approved exhibits; and 2) The project's record of decision including conditions of approval and approved exhibits.

##### Police

2. If problems arise and the City receives excessive complaints or significant negative and/or criminal activity occurs, the City may revoke the Special Use Permit. This determination shall be subject to Section 17.212.080 of the City Zoning Code (Revocation of a Special Permit).

##### Sacramento Area Sewer District

3. Since, this application is not proposing any new wastewater producing development, SASD and SRCSD are refraining their comments. When this parcel is developed with new wastewater discharging infrastructure, connection(s) to public sewer would be required as per prevailing SASD requirements, standards and specifications at that time.
4. Improvements to the property may require payment of sewer impact fees. Impact fees shall be paid prior to issuance of Building Permits. Applicant should contact the Fee Quote Desk at 876-6100 for sewer impact fee information.

Exhibit 1A: Existing Site Plan

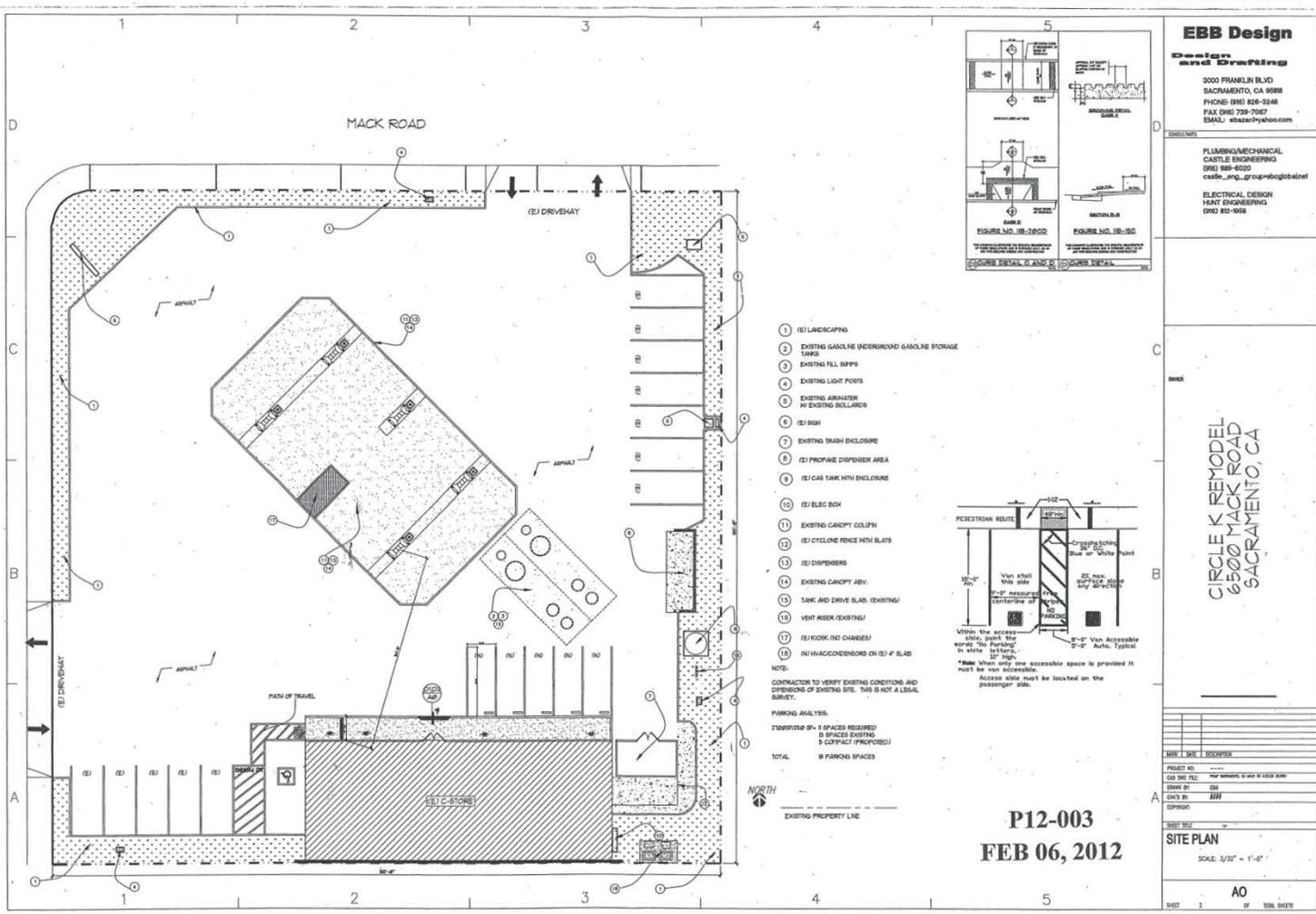
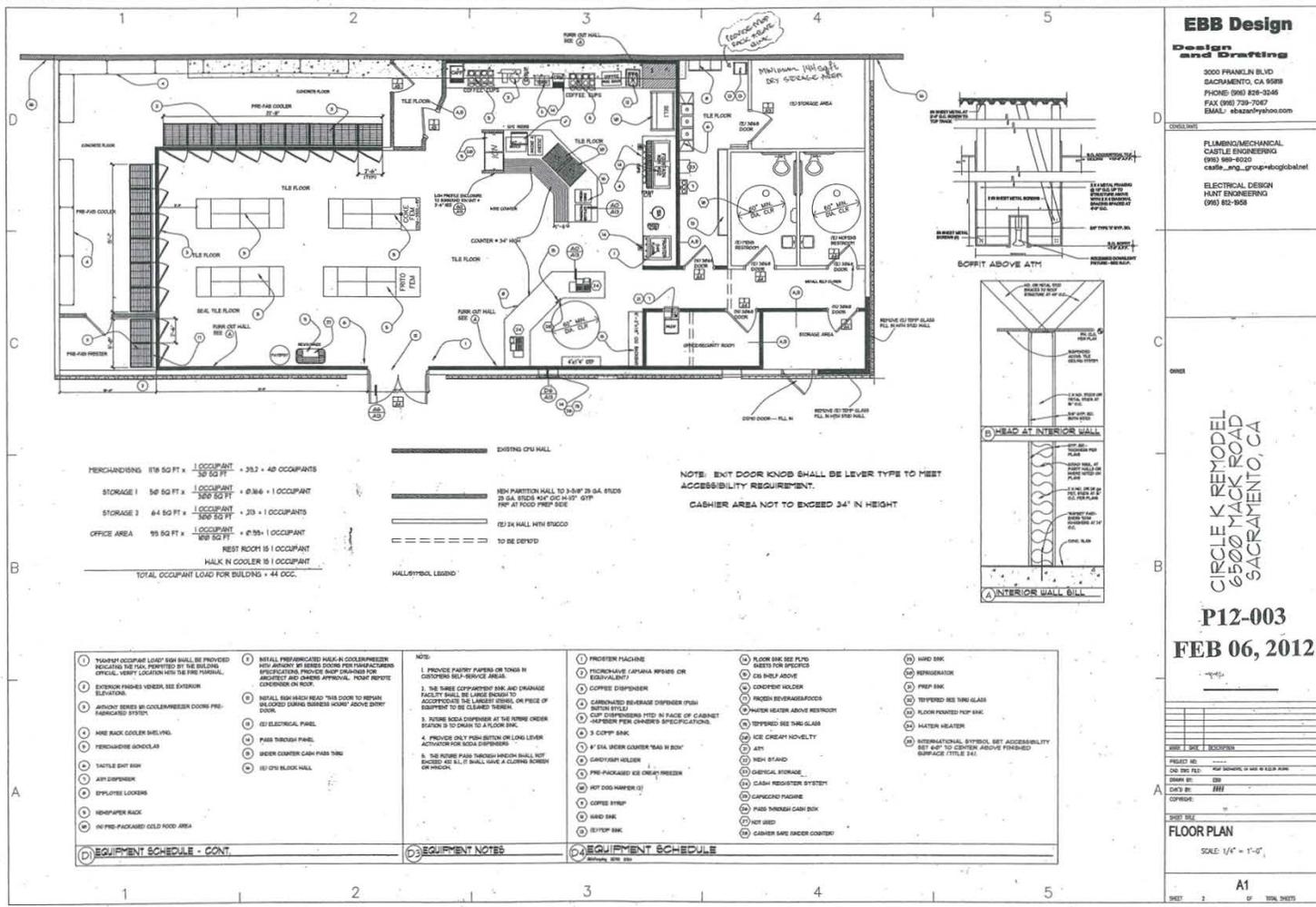


Exhibit 1B: Existing Floor Plan





**Attachment 2: Public Convenience or Necessity Letter**



DEPARTMENT OF  
POLICE

CHIEF OF POLICE  
RICK BRAZIEL

DEPUTY CHIEFS  
SAM SOMERS, JR.  
BRIAN LOUIE

CITY OF SACRAMENTO  
CALIFORNIA

April 20, 2012  
Ref. No.:4-01

5770 FREEPORT BLVD., SUITE 100  
SACRAMENTO, CA  
95822-3516

PH 916-808-0800  
FAX 916-808-0818  
www.sacpd.org

Paul Fuentes  
District Administrator  
Alcohol Beverage Control  
2400 Del Paso Road, Suite 155  
Sacramento, California 95834

Dear Mr. Fuentes:

The Sacramento Police Department has completed the investigation for the Circle K Gas Station located at 6500 Mack Road. The Police Department feels that Public Convenience or Necessity will be served.

Sincerely,

  
Sherri Scruggs  
Analyst, Sacramento Police Department

*The mission of the Sacramento Police Department is to work in partnership with the Community to protect life and property; solve neighborhood problems, and enhance the quality of life in our City.*

**Attachment 3: Applicant's Statement of Intent**

COPY



January 3, 2012

Captain Neil Schneider  
City of Sacramento Police Department  
5770 Freeport Blvd, Ste 100  
Sacramento, CA 95822

Re: Circle K Gas Station  
6500 Mack Road  
Sacramento, CA 95826

Dear Captain Schneider:

Pacific Convenience and Fuels ("PC&F") proposes to sell beer and wine at the Circle K Gas Station ("Circle K") located at 6500 Mack Road ("Mack Road"), Sacramento CA. Pacific Convenience & Fuels has over four (4) years of experience in the gas, liquor, and convenience store industry and owned 263 gas and convenience stations within the Western Region.

Pacific Convenience and Fuels applied for a Type 20: Off-Sale Liquor License with the California Alcohol Beverage Control (ABC) to sell beer and wine; no individual cans. A Public Convenience or Necessity (PCN) is required due to the over concentration of liquor licenses and located within a high crime census tract.

Pacific Convenience & Fuels is a mid-sized retailer who invested \$400,000 to complete the remodel back in 2010. The store was remodeled into a modern convenience store from an old closed repair bay facility. The remodel was based on the expectation of beer and wine sales; however, the lack of beer and wine sales has estimated profit impact of nearly \$100,000 annually. Eighty-seven percent of the time, customers who buy beer and wine will purchase other items at the convenience stores. This location loses profits from the beer and wine sales, and the profits on other purchased items. Currently, Mack Road generates \$510,000 per year on merchandise sales, which is half the expectation of similar stores in Sacramento, which do over \$1 million in annual sales. The site continues to underperform since it does not have the comparable offerings to their competitors.

Alcoholic beverages (beer and wine) comprise a small percent of the store shelf-space. It is a small but important part of the convenience and necessity for their clientele at the retail location, let alone the Circle K Gas Station. The gas station is located on a main commuter road where thousands of people travel everyday to and from work. The idea is for the patrons of Circle K Gas Station to stop at the gas station, gas up their car, pick up a gallon of milk, loaf of bread,

916-731-4435 ■ 916-731-5139 FAX  
442 Pico Way, Sacramento, CA 95819

Recycled Paper

**P12-003**  
**FEB 06, 2012**

soda, and/or beer and wine for dinner with friends or family that evening. Although the alcohol sales represent a small component of Circle K Gas Station's overall operation and generate about five percent (5%) of the total store sales, by providing a whole host of products, including alcoholic beverages available to the consumer at the store, the public convenience of the area will certainly be served. Without it, a customer may be obligated to travel a range of retail outlets in order complete their minimal shopping. Pacific Convenience & Fuels is committed to improving the communities they operate. They also take pride in every project they develop, operate, and believe in Community Involvement.

#### Security and Control

Pacific Convenience & Fuels is committed to taking all feasible steps to address law enforcement and surrounding neighborhood concerns. There is only one customer entry/exit which is located at the front of the store where security cameras are visibly placed, yet out of reach, to capture every individual who enters into the store. Moreover, the sale of alcoholic beverages is not their primary purpose. Although the store may be a convenience store, they offer wide ranges of everyday products for those to pick up items on their way to and from work.

The Circle K Station is designed to provide a safe environment to the patrons and employees. In order to accomplish this, design elements are incorporated into their security plan. The storefront includes large glass windows/doors so that the store is visible from the exterior of the building. Additional security measures include adequate lighting, employee supervision of the facility, closed circuit video monitoring system with cameras located throughout the property and within the store, and careful window sign and landscaping placement to avoid obstruction of visibility in and out of the store.

Pacific Convenience & Fuels understands the importance of maintaining the positive appearance of the store to both expand their customer base and prevent criminal activity. The store's property maintenance program includes timely graffiti and liter removal, repairs to structures, and signs and curbs painting to encourage parking in designated spaces and strategic trash receptacle placement. They are committed to a neighborhood store that allows for a safe family oriented shopping experience. Pacific Convenience & Fuels will provide and/or do the following:

1. Security cameras visible, yet not accessible by reach, focusing on where the alcohol products are located within the store.
2. Post and maintain a professional quality sign stating "No Open Alcoholic Beverage Containers are Allowed on these Premises,"
3. The possession of alcoholic beverages in open containers or consumption of alcoholic beverages is prohibited on the premises,
4. The parking lot of the premises shall be equipped with lighting of sufficient power to illuminate the appearance and conduct of all persons on or about the parking lot.

Additionally, the position of such lighting shall not disturb the normal privacy and use of any neighboring residences,

5. Any graffiti painted or marked upon the premises shall be removed or painted over within 72 hours of discovery,
6. Litter shall be removed daily from the premises, including adjacent public sidewalks and all parking areas under the control of the license,
7. All areas under the control of the license shall be swept or cleaned, either mechanically or manually, on a weekly basis to control debris,
8. Install locking beer doors device where the clerk must unlock the refrigerated door in order to allow the individual to purchase the beer.
9. Train employees thoroughly on the proper sales of age restricted items and enforce an under 40 ID policy.
10. All bottles of wine are sold in 750 ml or greater. No singles sold
11. Hours of operation from 6 am to 11 pm, per the City of Sacramento Zoning Code.
12. Reasonable operating conditions that the Police Department considers appropriate to address any concerns. Pacific Convenience & Fuels will continue to work with the Police Department once the license is active and operating.

#### Public Health, Safety, and/or Welfare

Presently, the site does not negatively impact public health, safety, or welfare and the addition of selling alcoholic beverages will not change this. Beyond this, it should be noted that with Pacific Convenience & Fuels experience of over four (4) years within the gas, food, and convenience store industry, they take pride in every project they develop and operate. They hold over 200 beer licenses and have no suspensions or revocations. Pacific Convenience & Fuels takes their responsibilities as retailers very seriously and wherever they do business, they treat it like their own home community, often by imposing their own restrictions as necessary. They will ensure that all employees understand and comply with all ABC laws and regulations.

#### Conclusion

Although the store site is located in a high crime and over concentrated census tract, permitting the sale of alcoholic beverages at the site will provide customers the added convenience of making purchases of alcoholic beverages along with their other grocery needs. To maintain the Mack Road location, PC&F needs to have the ability to carry the same products as their competitors. This location, character, manner, and method of operation will serve the growing community of Sacramento.

Thank you for your attention to this matter. If you have any questions regarding this matter, please don't hesitate in contacting me at (916) 996-2019.

Sincerely,

A handwritten signature in cursive script that reads "Brian Holloway". The signature is written in black ink and has a long, sweeping horizontal flourish extending to the right.

Brian Holloway  
Holloway Land Company

Attachment 4: Land Use & Zoning Map

